

DECLARATION OF CHARLES P. FORMOSA

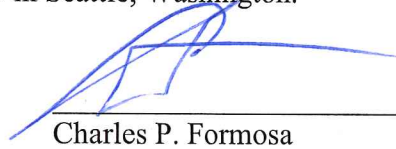
I, Charles P. Formosa, do hereby declare:

1. My name is Charles Formosa. I am an investigator with the Federal Public Defender's Office for the Western District of Washington, where I have been employed since February of 2007. I have been an investigator since July of 1995, and my entire career has been as a defense investigator. From July 1995 through November 1998, I was employed by the Office of the Capital Collateral Representative in Florida, where I was assigned to investigate the cases of inmates sentenced to death by the state of Florida throughout state post-conviction proceedings and Habeas Corpus review. From November 1998 to February 2007, I was employed by the Federal Public Defender's Office in the Eastern District of California, where I was assigned to investigate the cases of inmates sentenced to death by the State of California during Habeas Corpus review.
2. As part of my duties, I was asked by Assistant Federal Public Defender Mo Hamoudi to obtain a declaration from Jennifer Allen for Joseph Allen's Sentencing Memorandum.
3. On November 20th, 2019, I traveled to Kirkland, Washington and met with Jennifer Allen. Mrs. Allen asked me to read her the declaration because she has a learning disability which makes it hard for her to read. Mrs. Allen stated she is able to write stream of conscious, but most of the time it is difficult to comprehend things that are written.
4. I read Mrs. Allen the declaration. She directed me to make changes where the information was incorrect. I corrected the declaration by either crossing out certain

information or added to the declaration information that was missing. I read to her the part of the declaration where the oath is taken swearing that the declaration is true and correct to the best of her knowledge under the penalty of perjury. She understood her declaration was a sworn statement. She proceeded to sign the declaration and initial all of the other edited parts.

I declare under the penalty of perjury under the laws of Washington and the United States of America that I have read the foregoing declaration and it is true and correct.

Executed this 2nd day of December, 2019 in Seattle, Washington.



Charles P. Formosa

JAA Jennifer
DECLARATION OF JENNIFER ALLEN

I, ~~Joseph L.~~ Allen, do hereby declare:

1. My name is Jennifer Allen. I am married to Joseph Allen. We have been in a relationship for 8 years and married on July 7th, 2018. We lived together off and on while we were dating. Sometimes I stayed with Joseph and other times staying with my grandparents.
2. In 2015, we moved in with Stephanie Marinoff at [REDACTED] in Auburn. She noticed that Deputy Timby and Deputy Jacobs always seemed to be parked up the block from the house. They constantly pulled over anybody that left the house harassing them. They asked people questions about drugs or asked if Joseph was at home. I do not drive so when leaving the house walked. They stopped me a few times asking if I had drugs on me and if there were drugs in the house. They started to recognize me and I did not have a criminal record. One night at about 9 pm, I noticed a cop car following me. It was slowly creeping behind me. I stopped and the cop car came up to me and asked me where Joseph was. *The deputy was Leary County Sheriff Deputy Jacobs.*
3. The scariest interaction with law enforcement was when Timby showed up with a bunch of other officers dressed in tactical gear threatening to raid the house. They pounded on the door yelling that they had a warrant for Joseph's arrest. Joseph and I were already in bed and having sex. I got out of bed and answered the door with Stephanie who came out from her room. Timby was demanding that they had a DOC warrant for Joseph's arrest. Stephanie and I were both scared because there were way too many cops in tactical gear and an overhead helicopter. It did not seem like they

needed that many cops for a DOC warrant. I was afraid they might hurt Joseph. After they threatened to raid the house and tear it up, Joseph came out onto the porch while Timby aimed his automatic rifle at Joseph's head and he was arrested. While his hands were cuffed behind his back, Joseph made some comment towards Timby. Timby smacked Joseph in the head with the tip of his gun.

4. I learned later that the cops thought Joseph had stolen a motorcycle and had law enforcement chase him around in a high speed chase. While Joseph was supposedly doing this, he was actually with me. Neither Timby nor the other officers asked me if Joseph had been with me that night. I had to go to court and tell a judge during a bail hearing that he was with me. The prosecutor was asking for a \$350,000 bond before Joseph could be released. I went on the record and told the judge Joseph was with me. The charges were dropped and his bond was dropped to \$50. After that hearing, Timby ~~stopped me while walking and~~ told me that he heard that I lied in court. JAA JAA JAA

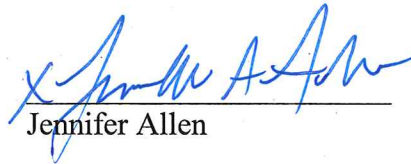
5. Another time Timby hurt Joseph was when Joseph and I were helping some friends move. Timby and Jacobs pulled Joseph up. Joseph ran into a field next to the place they were helping the friends move. They yelled out and told Joseph to come out, but he did not. They went into the field and found Joseph. They pulled him out handcuffed and put him in the back of Timby's car. I was trying to talk to Joseph through the window and Timby got angry and told me to get away from the car. I saw Timby lean towards Joseph car and say something. I could not hear it because the windows were closed. Joseph started getting upset, rocking the car, and yelling that Timby said he was going to kill me. Joseph was really upset. I asked for a supervisor to come down and called

911 for help. Timby's behavior changed and Joseph was moved to another's officers car. Previously Timby was being confrontational with me and Joseph. Afterwards he was very diplomatic and nice.

6. One time after Timby arrested Joseph, Joseph told me that Timby and a couple of other cops beat him up before taking him to jail. I went to see him in jail after he had arrived and he had a black eye. Joseph told me Timby punched him.
7. Timby threatened to have Joseph's child given to CPS unless he turned himself in to them. Timby and Jakobs had pulled over the mother of Joseph's child Casey Bufanda. Casey was around the corner from where we were living. Timby made Casey call Joseph on her cell phone. When Joseph answered, Timby told him to come around the corner to be arrested on a DOC warrant or they would take Casey to jail which would allow CPS to take their child into custody.

I declare under the penalty of perjury under the laws of Washington and the United States of America that I have read the foregoing declaration and it is true and correct.

Executed this 20th day of November, 2019 in Kirkland, Washington.


Jennifer Allen

DECLARATION OF Stephanie Marinoff

I, Stephanie Marinoff, do hereby declare:

1. My name is Stephanie Marinoff. I used to own the property at [REDACTED] Auburn, WA. I met Joseph through my son in 1999. He was living in his car at the time so I allowed him to move in with me and my son. In 2001, Joseph had a child with Leah. He moved out to live with her. Things did not work out with them living together so Joseph moved back in a couple of years later. In 2004 or 2005, Joseph went to prison. When he was released, he lived in the Tacoma area and went to prison again. After he was released from his last prison term, he ^{eventually son} came back to live with me.
2. My house has always been a focus of law enforcement, especially Deputy Timby and ^{(after Jacobs was hired) son} Jacobs of the King County Sheriff's Department. I took a lot of people who were homeless or sleeping in their cars to help them stay off of the street. Because of the help I afforded those who were down and out, my house was considered a "drug house". Deputies Timby and Jacobs would sit at each end of the street pulling anybody over once they left my house.
3. In 2012, my house was raided by the police and they were looking for a Stephanie Bols, who did not match my description or date of birth. They knew they had the wrong house yet the police pepper gassed my house when they raided it making it almost impossible to clear out the chemical smells for months.
4. In 2017, Timby raided the house looking for Joseph on what they stated was a DOC warrant. When I came out of the house, Timby told me to put down my phone so he would not think it is was a gun. This statement told me he was looking for a reason to

cause people harm. It was not right that he acknowledged I had a phone and told me to
put it down so ^{the officer said} he would not think it was a gun. When Joseph came out of the house
“bumblebeed” or surrounded by police on all sides so I could not see Joseph anymore.
When Joseph was taken and put into the back of a squad car, the officer hit Joseph in
the head with ^{the gun} barrel of his gun.

I declare under the penalty of perjury under the laws of Washington and the United States of
America that I have read the foregoing declaration and it is true and correct.

Executed this 22 day of November, 2019, in Seattle, Washington.


Stephanie Marinoff